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RACHEL DAMIANO and
KATIE MEDART

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF OREGON
MEDFORD DIVISION

**RACHEL G. DAMIANO and
KATIE S. MEDART,**

Plaintiffs,

v.

**GRANTS PASS SCHOOL DISTRICT
7, an Oregon public body, *et al.*,**

Defendants.

Case No. 1-21-CV-00859-CL

**NOTICE OF STIPULATION RE:
FILING OF PLAINTIFFS' SECOND
AMENDED COMPLAINT**

Ray D. Hacke of the Pacific Justice Institute, the attorney for Plaintiffs RACHEL DAMIANO and KATIE MEDART, hereby informs the Court as follows:

1. Plaintiffs' attorney has entered into a stipulation with Beth Plass, counsel for Defendants GRANTS PASS SCHOOL DISTRICT NO. 7 ("GPSD"), SCOTT NELSON, CLIFF KUHLMAN, GARY RICHARDSON, DEBBIE BROWNELL, CASSIE WILKINS, BRIAN DELAGRANGE, CASEY DURBIN, KIRK T. KOLB, and THOMAS BLANCHARD whereby Plaintiffs may file a Second Amended Complaint ("SAC") adding, and containing references to, an Exhibit "O," which shows that Defendant GPSD had a policy

encouraging Plaintiffs and other GPSD employees to make propose policies and regulations pertaining to students and instruction.

2. Defendants' counsel has informed Plaintiffs' attorney via e-mail that Defendants will not oppose the filing of the SAC.

I declare under penalty of perjury of the laws of the United States of America and the State of Oregon that the foregoing is true and correct, and that this declaration was executed on November 18, 2021 in Salem, Oregon.

Dated: November 18, 2021

PACIFIC JUSTICE INSTITUTE

/s/ LAUREN PEFFERLE
Lauren Pefferle
Legal Secretary for Plaintiffs
RACHEL DAMIANO and
KATIE MEDART

PROOF OF SERVICE

I am employed in the County of Marion, State of Oregon. I am over the age of eighteen and not a party to the within action; my business address is 1850 45th Ave., Suite 33, Salem, OR 97305.

On November 18, 2021, I served the following documents on the interested parties by placing a true copy thereof enclosed in sealed envelope(s) addressed to said parties:

NOTICE OF STIPULATION RE: FILING OF PLAINTIFFS' SECOND AMENDED COMPLAINT

PLEASE SEE ATTACHED SERVICE LIST

 X BY MAIL: I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same date with postage thereon fully prepaid at Salem, Oregon in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

 BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the office of the addressee(s).

 BY FACSIMILE TRANSMISSION: The facsimile machine I used complied with California Rules of Court 2003(3) and no error was reported by the machine. Pursuant to rule 2005(i), I caused the machine to print a record of the transmission, a copy of which is attached to this proof of service.

 (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

 X (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 18, 2021, at Salem, Oregon.

 /s/ *LAUREN PEFFERLE*
Lauren Pfefferle

SERVICE LIST

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